

ASBESTOS CONTROL PROGRAM (29 CFR 1910.1001)

1. **INTRODUCTION** - This document sets out the policy and procedures for managing asbestos in all St. Norbert College (SNC) buildings and facilities owned, occupied or operated by SNC. This document contains guidance for controlling risk presented by asbestos to ensure a safe environment for students, faculty, staff, and other persons working or using the College's premise. It also covers the survey and investigation work undertaken by designated Asbestos surveyor staff.

2. **SCOPE** - This document applies to all faculty, staff, and any contractors working on SNC property.

3. DEFINITIONS

a. **Asbestos** - a natural material (a fibrous silicate) found in rocks all over the world. The three main types of asbestos that were used in the United States are:

- i. Crocidolite (Blue asbestos)
- ii. Amosite (Brown asbestos)
- iii. Chrysotile (White asbestos)

These cannot be identified by their color alone. In addition, the following three types of asbestos have been known to be used (although in smaller amounts):

- iv. Fibrous Anthophyllite
- v. Tremolite
- vi. Actinolite

For the purpose of this document all types of asbestos and any mixture containing any of these materials, will be treated the same and will be defined, generally, as the term asbestos.

b. **Asbestos Control Program** - A premises specific Asbestos Management Plan that keeps exposure to and risks from asbestos, to a minimum by:

- i. Providing high quality asbestos management service oversight.
- ii. Making faculty, staff, and contractors aware of the presence of asbestos containing materials when found and the procedures in place to deal with them.
- iii. Maintaining all asbestos in a sealed and safe condition or removing asbestos as part of an on-going maintenance program.

c. **Asbestos Survey/Register** - Hard copy and/or electronic record system used to provide up to date information on the location and condition of asbestos and/or asbestos

containing materials (ACM) in all premises where this policy applies.

- d. **Contractor** - A firm or person who has entered into an agreement with St. Norbert College to carry out work for SNC.
 - e. **Contractors Agreement Document** - Contract document, setting out SNC safety, environmental, statutory requirements and standards.
4. **RESPONSIBILITIES** - Persons whose normal duties may bring them into contact with Asbestos Containing Material (ACM) will be trained to recognize asbestos products and work to approved safe procedures, as prescribed by law within 30 days of hire/job transfer and annually.

The Director of Facilities (or their designee) and the HR Environmental Health and Safety Specialist shall work to identify the locations and conditions of asbestos throughout the college. They will also ensure that risks are mitigated and that employees are properly notified and trained on the presence of asbestos, on the care and maintenance of PPE (Personal Protective Equipment) to manage asbestos exposure, and any updates to changes in asbestos presence.

Every effort shall be made to utilize engineering or administrative controls to reduce the potential for asbestos exposure. In those instances when this is not possible, PPE shall be provided to protect all staff, faculty, students, and contract workers.

- a. **Departments** - The Facilities Department managers and supervisors are responsible for compliance with the criteria set forth in this program. They must ensure that all elements of this program and related procedures are implemented and followed.

b. Departmental Managers

- i. Implement and enforce PPE requirements within their respective area(s) of responsibility to ensure compliance with all aspects of this policy.
- ii. Provide PPE to all applicable employees and communicate the necessary PPE requirements.
- iii. Evaluate the workplace to identify substandard or otherwise hazardous conditions, which may require administrative controls, engineering controls, PPE, or any combination thereof as a means to ensure employee health and safety.
- iv. Ensure that employees who require PPE receive periodic training including the proper use and limitations of their PPE as it pertains to asbestos environments.
- v. Ensure that all employees understand the job tasks or areas where asbestos containing materials are located.
- vi. Establish and maintain a system, which assures the proper cleaning, maintenance, and storage of all PPE.

c. HR Environmental Health and Safety Specialist

- i. Review changes in operations and keep current with new processes and/or facilities within the company and identify new asbestos-related requirements, when needed.

- ii. Work with managers and coordinate efforts to analyze/minimize occupational exposures.
- iii. Document training records and maintain in divisions folders.
- iv. Undertake the required reporting, investigation, and administration of any asbestos-related exposure induced occupational diseases or conditions.
- v. Ensure that hazard assessments have been completed to determine exposure potential and type of PPE, if any, to be used.
- vi. Ensure hazard assessments are certified, signed, and dated.
- vii. Maintain assessments in the HR department.
- viii. Work with the Facilities Responsible Person and maintain a current Asbestos Register.

d. Employees

- i. Take part in all required training associated with asbestos familiarization as well as to work in such a manner which reduces the possibility of damaging or disturbing asbestos containing materials.
- ii. Use PPE as instructed and in accordance with training received.
- iii. Maintain PPE and report any damage or loss to supervisor or manager.

5. PROCEDURES

a. Training - Training programs for employees potentially exposed to asbestos containing materials will include:

- i. Asbestos recognition and uses
- ii. Health Effects
- iii. Potential Locations
- iv. Who is potentially at risk
- v. Protection against asbestos
- vi. Controlling asbestos exposure-limiting environments

b. Procedures/Course of Action Required - Asbestos surveys are carried out on all college properties when conditions arise that necessitate such action. Asbestos containing materials are to, ultimately, be identified or presumed. The results of the surveys and inspections are maintained by either the College Facilities department.

c. Identification of Asbestos - Asbestos products identified will be recorded in an Asbestos Register. Staff, faculty, contractors and other affected parties shall have sufficient access to allow identification of areas and materials. Sufficient detail shall be provided to each potentially affected party to ensure they are aware of the extent of any asbestos within the

proposed working area(s).

- d. Discovery of further Asbestos** - It is recognized that asbestos products were widely used and previously undiscovered products may still be found on SNC properties. If concerns exist as to potential asbestos containing materials, work shall cease immediately and the Supervisor is informed. If after inspection, there is any doubt as to whether the product contains asbestos, the Director of Facilities (or their designee), shall arrange for tests to be carried out. If the product is found to contain asbestos, a formal assessment is to be conducted and the Asbestos Register is to be updated.

The risk assessment shall be carried out in accordance with Federal, State, and County laws and the resulting rating shall identify whether the product can be safely managed or should be removed.

Any material that has been sealed or protected, regardless of its condition category, shall be recorded as such. This must include areas sealed during the course of the survey following sampling and emergency repairs.

The risk assessment shall include a Material Assessment and a Priority Assessment. The Material Assessment shall look at the type and condition of the asbestos containing material (ACM) and the properties of the materials with which it might be released if disturbed. The following four parameters are to be considered:

- i. Product Type
- ii. Condition
- iii. Type Of Finish
- iv. Asbestos Type

The Priority Assessment shall consider the likelihood of someone disturbing the ACM. The three following parameters are also to be considered:

1. Vulnerability
2. Human Exposure Potential
3. Extent of ACM

- e. Remedial Work** - Any remedial work shall have been identified as part of the risk assessment, however, it will not normally be necessary to further seal, enclose, or remove materials containing asbestos that are sound, undamaged, and unlikely to release dust. These materials will be managed as follows:

- i. Where undamaged asbestos containing materials are specifically identified, the location must be noted on the premises survey and recorded on the Asbestos Register.
- ii. The presence of any material containing asbestos must be noted on the premises survey and recorded on the Asbestos Register, and updated as soon as removal is accomplished.

- iii. Periodic re-inspection will be undertaken by assessing material degradation or deterioration in accordance with the table below.
- iv. Periodic re-inspection must be undertaken, as necessary, to ensure the condition of the material has not changed. The inspection will be visual only, to avoid unnecessary disturbance or fiber release and will not involve removal of covering material, e.g. duct panels or ceiling tiles.
- v. A Record of All Inspections must be maintained in a Asbestos Register file plan, maintained by the HR Environmental Health and Safety Specialist.
- vi. The position of warning signs and labels on asbestos containing materials is beneficial in decreasing the chance of inadvertent damage and exposure. However, labeling is not always appropriate in certain environments or where the label may cause undue distress or fear in the building occupants. Therefore, in discreet or high-risk areas, e.g. boiler houses, plant rooms, equipment store rooms, asbestos labels should be used. Where the Responsible Person believes labeling could cause alarm or malicious damage, e.g. in common or public areas of buildings, a decision may be taken not to label items with asbestos labels. When the Responsible Person decides not to label, then all staff involved in maintenance or building works need to be aware of the presence of asbestos containing materials as well as the procedure for responding to changes in condition, or damage to such materials. Also, records containing such information must be made available to staff upon demand (as prescribed by law).
- vii. Facilities Department managers will ensure the management of asbestos is in accordance with the requirements of this schedule. If, on inspection, any material containing asbestos is found to be damaged or deteriorated, the Responsible Person shall ensure it is reassessed and reclassified.

f. Maintenance and Building Work

- i. When drawing up specifications for any building and maintenance work, the appointed Responsible Person must take all reasonable precautions to determine whether asbestos is present including consulting the premises Asbestos Register/Survey and drawings. Any information regarding the presence of asbestos shall be passed on to contractors and/or direct labor, together with a notification that not all asbestos containing material may have been identified. Prior to undertaking any work which “may be liable to disturb asbestos” a “suitable and sufficient” (i.e. refurbishment & demolition survey) shall be undertaken so as to ensure full compliance. This type of survey is fully intrusive in nature (but can be localized) and will cover the fabric of the building as well as all areas not covered or inspected during the asbestos management survey. The survey should be undertaken in areas where work is planned to be undertaken.
- ii. The College, its employees, and affiliates shall aim to prevent the exposure of employees to asbestos. The following measures shall be implemented to reduce the risk of exposure to asbestos:
 - 1. Removal of materials containing asbestos before any major work begins. Work methods which minimize breakage, abrasion, machining, or cutting of asbestos materials. Dust suppression by wetting where appropriate.

Segregation by not carrying out asbestos work and other work in the same place at the same time. Any contractor intending to undertake work with any asbestos must be in compliance with OSHA 29 CFR 1001 and ch. NR 447, 502 and 506, Wis. Adm. Code.

2. All asbestos work which are identified as required, whether through planned works or reactive response, will be channeled through the Director of Facilities (or their designee).
3. As part of this process, all work will have a job specific scope of job function produced by the appropriate Facilities designee for obtaining costs or procedures for removal.

g. Emergency Procedures (Suspected Damage to Asbestos Containing Materials)

- i. If it is suspected that an asbestos containing material has been damaged which constitutes a major release event (exceeding three square or linear feet of friable ACM), the immediate area must be evacuated. The appropriate Facilities Manager and the HR Environmental Health and Safety Specialist MUST be informed. The Director of Facilities (or their designee), or, in the case of out of normal working hours, the on-call technician, will attend the site, ascertain the extent of any potential contamination, and advise on the appropriate course of action.
- ii. If the Director of Facilities (or their designee) or the on-call technician determines that the material does contain asbestos, a sample of the material, shall be sent for analysis as a matter of urgency.
- iii. On completion of the cleaning, the Director of Facilities (or their designee) will inform staff and contractors that the area is safe for normal access and remove any barriers, etc. The Director of Facilities (or their designee), along with the HR Environmental Health and Safety Specialist will determine the cause and carry out an investigation into the incident. The report findings and recommendations concerning the incident will be issued for appropriate action.
- iv. The procedures given in APPENDIX A-1, Asbestos Incident Reporting Flow Chart, should be followed, so far as reasonably practicable, in the event of an emergency.

h. Asbestos Register - This document gives details of asbestos containing materials, assessments, and locations.

- i. The HR Environmental Health and Safety Specialist will ensure that the Asbestos Register is updated as required. The register shall be stored electronically.
- ii. All contractors shall be made aware of this program and procedure, as well as details of the location of all known ACM's prior to commencing work.
- iii. All persons who supervised work with asbestos are responsible for complying with relevant procedures and if in doubt will seek advice and assistance from the HR Environmental Health and Safety Specialist, and shall have access to the Electronic Asbestos Register for all SNC buildings and facilities, when

requested.

6. **MONITORING** - The Director of Facilities (or their designee) shall ensure that a system of inspection to monitor known areas containing asbestos is maintained. Employees must be instructed to report any damage that occurs to material containing asbestos immediately (verbally), to their manager or supervisor, as soon as possible. Contractors must be instructed to report damage immediately (verbally) to their SNC contact and confirmed in writing as soon as possible.
7. **PROGRAM EVALUATION** - The HR Environmental Health and Safety Specialist will conduct periodic evaluations of the workplace (at least annually) to ensure that the provisions of this program are being implemented. The evaluation will include regular consultations with employees who work on or around ACM and their supervisors, site inspections, and review of records. Identified problems will be noted and addressed by the HR Environmental Health and Safety Specialist. These findings will be reported to management, and the report will list plans to correct deficiencies and articulate dates for the implementations of those corrections.
8. **DOCUMENTATION AND RECORDKEEPING** - Copies of training will be retained by the HR Environmental Health and Safety Specialist. These records will be updated as new employees are trained and as existing employees receive refresher training. Training records shall be maintained at the affected department and at the HR department.
9. **PROGRAM REVIEW AND UPDATE** - This policy shall be reviewed and updated on an annual basis or sooner if necessary.

Date	Update or Revision	By Whom
2/8/18	Initial Policy Creation and Review	P. Wrenn, M. Van Drisse, and M. Eddy
6/22/18	Reviewed updates by P. Wrenn and E. Jahnke	M. Eddy

APPENDIX A-1 – ASBESTOS INCIDENT FLOWCHART

